

Hearing Date: July 23, 2020
Hearing Time: 2:00 p.m.

TARTER KRINSKY & DROGIN LLP

1350 Broadway, 11th Floor

New York, NY 10018

Tel: (212) 216-8000

Scott S. Markowitz, Esq.

Rocco A. Cavaliere, Esq.

Michael Z. Brownstein, Esq.

Counsel for Ad Hoc Committee of NAS Children

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:
PURDUE PHARMA L.P., et al.,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**THE NAS CHILDREN AD HOC COMMITTEE'S JOINDER TO THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS' RESPONSE TO AND REQUEST FOR
ADJOURNMENT OF CLASS CLAIM MOTIONS UNTIL CONCLUSION OF MEDIATION**

TO THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE

The Ad Hoc Committee of NAS Children (the "NAS Committee") respectfully joins in
the Official Committee of Unsecured Creditors' (the "Official Committee") Response To and

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Request For Adjournment of Class Claim Motions Until Conclusion of Mediation [Docket No. 1425] (the “UCC Response and Request”), and respectfully states as follows:

JOINDER

1. The NAS Committee, a mediation party, joins the Official Committee’s Response and Request and the arguments set forth therein as if fully set forth herein. The NAS Committee strongly agrees with the Official Committee that proceeding with the NAS Motion (as defined herein) at this time could cause irreparable harm to the mediation process, and result in the loss of millions of dollars spent by the Debtors’ estates in connection therewith prior to the date hereof. With the Bar Date only 8 calendar days away, the NAS Motion was filed, as the Debtors and the other objection parties are well aware but chose to ignore, solely to preserve the status quo pending the ongoing mediation. The NAS Committee contends that there is neither sufficient cause nor a legitimate reason to disrupt the mediation process at this time with extraneous litigation.

2. For these reasons, the NAS Committee is resolved to continuing mediation in lieu of proceeding with its motion, styled *NAS Guardians on Behalf of the NAS Children’s Abatement Class Action Claimants Motion for Entry of an Order Pursuant to Fed. R. Bankr. P. 9014 and 7023 Permitting them to File a Class Proof of Claim and Granting Related Relief* [Docket No. 1362] (the “NAS Motion”) at this time.

3. Nothing contained herein shall constitute a waiver of any rights or remedies of the NAS Committee under title 11 of the United States Code or applicable law, including, without limitation, the right to (i) amend, modify, or supplement this Joinder, or (ii) raise any other additional arguments at a later date.

CONCLUSION

4. The NAS Committee respectfully requests the Court (i) continue the NAS Motion in the manner set forth in the Official Committee's Response and Request and (ii) grant such other and further relief as this Court deems just and proper.

Dated: July 22, 2020
New York, NY

Respectfully submitted

/s/Scott S. Markowitz
TARTER KRINSKY & DROGIN LLP
Scott S. Markowitz
1350 Broadway, 11th Floor
New York, NY 10018
Telephone: 212-216-8000
Facsimile: 212-216-8001
Email: smarkowitz@tarterkrinsky.com

MARTZELL, BICKFORD & CENTOLA
Scott R. Bickford (LA 1165)
Spencer R. Doody (LA 27795)
338 Lafayette Street
New Orleans, LA 70130
Telephone: 504-581-9065
Facsimile: 504-581-7635
sbickford@mbfirm.com
srd@mbfirm.com
usdcndoh@mbfirm.com

CREADORE LAW FIRM PC
450 Seventh Avenue, 14th Floor
New York, NY 10123
Telephone: 212.355.7200
Donald Creadore, Esq. (NY 2090702)
donald@creadorelawfirm.com